



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NEW YORK 10007

Amy Robinson  
Senior Counsel  
arobinso@law.nyc.gov  
Phone: (212) 356-3518  
Fax: (212) 356-1148

May 18, 2022

**By Email**

To All Counsel of Record

In Re: *New York City Policing During Summer 2020 Demonstrations*  
20 Civ. 8924 (CM) (GWG)

Counsel:

As promised at the last meet and confer on this issue, contained herein are; (a) defendants' positions on plaintiffs' April 19, 2022, requests for identification of Bates numbers for 30 out of the 101 Consolidated Document Requests, including: 1-4, 7, 12, 17, 20, 31-33, 35, 39-41, 49, 52, 54, 56, 57, 70, 71-73, 75, 76, 78, and 88-90; (b) the anticipated date of completion and (c) defendants' position as to whether this project is a sanction.

1. Defendants agree to provide Bates numbers for Request Nos. 2, 3, 4, 12, 39, 40, 41, 49, 52, 54, 56, 57, 70, 71, 72, 73, 75, 76, 78 and 90.

Defendants agree to provide Bates numbers for Request No. 20 as to the MOS listed excluding, "Incident Commanders."

Defendants agree to run keyword searches as to Request Nos. 31-33 to simply confirm that such documents were produced.

2. The parties are at an impasse as to Request Nos. 7, 17, 35 and 88.
3. The calculation of time needed to complete this project is based upon the time spent providing Bates numbers for Request No. 1, which included over 20 hours expended by our E-Discovery Team and approximately 30 hours of review by our Case Team over two weeks. It is clear from the amount of time required to provide Bates numbers for Request No. 1, that doing the same for the agreed-to requests will be quite burdensome. Therefore, defendants expect that providing responsive Bates numbers for the agreed-upon Requests will be completed at best by July 22, 2022, depending on the volume of depositions and other discovery matters that arise which must be addressed during the same time period. Additionally, if defendants discover that it is impossible to meet this deadline, defendants reserve the right to seek an extension from the Court after conferral. Defendants agree to provide responsive Bates numbers on a rolling basis.

4. This project is not part of the sanction ordered by Judge Gorenstein during the April 12, 2022, conference.

Very truly yours,

*Amy Robinson*  
Senior Counsel  
Special Federal Litigation Division